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HARRISBURG, PA

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

JUL 18 2000

MARY E. D'ANDREA, CLERK
PER STC DEPUTY CLERK

GLEN WILLIAM KOSKI, :
Petitioner :
: :
v. : Civil No. 1:CV-00-0640
: (Judge Rambo)
UNITED STATES, :
Respondent :
:

RESPONDENTS' MOTION FOR LEAVE
TO FILE A REPLY TO PETITIONER'S TRAVERSE

Respondent requests this Court to grant it leave to file a reply to petitioner's traverse and states the following in support thereof:

- 1) Petitioner, Glen William Koski, is a federal prisoner presently confined at the Federal Prison Camp Allenwood, Montgomery, Pennsylvania.
- 2) Petitioner filed his petition for writ of habeas corpus against the United States on April 10, 1999.
- 3) On June 9, 2000, the Court directed respondent to show cause on or before June 29, 2000, why petitioner should not be granted habeas corpus relief.

4) On June 29, 2000, respondent filed its Response To Habeas Corpus Petition.

5) On or about July 10, 2000, petitioner filed his traverse.

6) Respondent now seeks leave of Court to reply to the traverse as the petitioner raises a new factual assertion that the Bureau of Prisons did not address previously.

7) Respondent believes that briefly clarifying the new factual assertion made by petitioner regarding prior custody credits will aid the Court in resolving this habeas matter.

Wherefore, respondent respectfully requests this Court to grant its request for leave to reply to the traverse.

Respectfully submitted,

DAVID M. BARASCH
United States Attorney



KATE L. MERSHIMER
Assistant U.S. Attorney
SHELLEY L. GRANT
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225 Walnut Street
Post Office Box 11754
Harrisburg, PA 17108

Dated: July 18, 2000

UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers.

That on this 18th day of July, 2000, she served a copy of the attached

**RESPONDENTS' MOTION FOR LEAVE
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by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the places and addresses stated below, which is the last known addresses, and by depositing said envelope and contents in the United States Mail in Harrisburg, Pennsylvania.

Addressee:

Glen William Koski
Reg. No. 03235-082
F.P.C. Allenwood
P.O. Box 1000
Montgomery, PA 17752-9718

Shelley L. Grant
SHELLEY L. GRANT
Paralegal Specialist